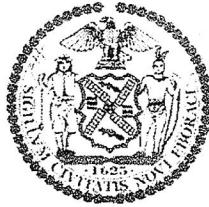


EXHIBIT B



Eric Gonzalez
Acting District Attorney

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Toni C. Lichstein
Civil Litigation Bureau
Chief

July 22, 2019

Mirel Fisch, Esq.
The Law Offices of Anthony Grandinette
114 Old Country Road Suite 420
Mineola, NY 11501

Re: O'Hara v. The City of New York, et al.
17cv 4766 (EDNY)

Dear Ms. Fisch,

As we discussed, I am enclosing a disc which contains the initial portion of the Kings County District Attorney's Office Conviction Review Unit file responsive to your subpoena. I will be sending additional materials as they become available for production. At the conclusion of production we will provide a privilege list.

You will see on the disc documents redacted in their entirety. In large measure they are Accurint Reports used by the Detective Investigators to attempt to locate potential witnesses.

I also am enclosing formal objections to the subpoena.

Please call me if you have any questions.

Very truly yours,
Toni C. Lichstein

Toni C. Lichstein
Assistant District Attorney
(718) 250-2182

encl.